

THE GRAND JURY CHARGES:

COUNT 1 [Receipt of Child Pornography]

From in or about August, 2023, through on or about November 18, 2023, in Onondaga County in the Northern District of New York, the defendant, **LAWRENCE BOONE**, did knowingly receive child pornography using a means and facility of interstate and foreign commerce, shipped and transported in and affecting such commerce by any means, including a computer, in that the defendant, using an Internet-based messaging application, received numerous graphic video and image files depicting one or more minors engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNTS 2-3 [Distribution of Child Pornography]

On or about the dates listed below, in Onondaga County in the Northern District of New York, the defendant, **LAWRENCE BOONE**, did knowingly distribute child pornography using a means and facility of interstate commerce, shipped and transported in and affecting such commerce by any means, including by computer, in that the defendant, using an Internet-based messaging application, distributed to another application user one or more graphic video and image files depicting one or more minors engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252(a)(2)(A).

Count	Date	Recipient
2	August 18, 2023	Recipient who utilized telephone number
		817-XXX-7997
3	November 18, 2023	Recipient who utilized telephone number
		658-XXX-0267

COUNTS 4-7 [Possession of Child Pornography]

On or about November 21, 2023, in Onondaga County in the Northern District of New York, the Defendant, **LAWRENCE BOONE**, did knowingly possess material that contained one or more images of child pornography that had been transported using a means and facility of interstate and foreign commerce, and in and affecting such commerce by any means, including by computer, and that was produced using materials that had been shipped and transported in and affecting such commerce by any means, including by computer, that is, the devices listed below, each of which contained numerous graphic image and video files of minors engaged in sexually explicit conduct in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

Count	Device	
4	Samsung Galaxy S22+ cellular telephone, serial number RFCT60BN17A, manufactured outside New York state	
5	Samsung Galaxy 89+ cellular telephone, serial number RF8K41W2XAN, manufactured outside New York state, containing a SanDisk MicroSD card labeled "128", manufactured in Malaysia	
6	Black HP Pavilion laptop computer, serial number 5CD023DNL8, manufactured in China	
7	Dell OptiPlex 7450 AIO Series desktop computer, service tag number FR9LB02, manufactured in China	

Those violations involved images of child pornography involving prepubescent minors and minors who had not attained 12 years of age, in violation of Title 18, United States Code, Section 2252A(b)(2).

FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 7 of this Indictment are hereby realleged and incorporated by reference herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253(a)(3), upon conviction of the offenses alleged in Counts 1 through 7, the Defendant, LAWRENCE BOONE, shall forfeit to the United States of America any property, real and personal, used and intended to be used to commit and to promote the commission of the offense. The property subject to forfeiture includes, but is not limited to, the following:

- a. One (1) Samsung Galaxy S22+ cellular telephone, Serial Number RFCT60BN17A;
- b. One (1) Samsung Galaxy S9+ cellular telephone, serial number RF8K41W2XAN,
 containing a SanDisk MicroSD card labeled "128";
- c. One (1) Black HP Pavilion laptop computer, serial number 5CD023DNL8; and
- d. One (1) Dell OptiPlex 7450 AIO Series desktop computer, service tag number FR9LB02.

Dated: March 27, 2024

A TRUE BILL,

**NAME REDACTED

Grand Jury Foreperson

CARLA B. FREEDMAN United States Attorney

By:

Benjamin A. Gillis

Assistant United States Attorney

Bar Roll No. 704915